

EXHIBIT “1”

LAW OFFICES
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JAY EDMOND RUSS
LINDA EILEEN RUSS

•Also Admitted in Connecticut

Of Counsel
IRA LEVINE
DANIEL P. ROSENTHAL*

June 5, 2025

(By email)

Simcha D. Schonfeld, Esq.
Koss & Schonfeld, LLP
160 Broadway
New York, NY 10038

Re: Margar Associates Limited Partnership v. Levitt, et al
Index No. 516603/2025 ("**Action No. 1**")

Margar Associates Limited Partnership v. Levitt, et al
Index No. 516608/2025 ("**Action No. 2**")

Dear Mr. Schonfeld:

This firm is the attorney for the Defendants in these two action. My office has filed Notices of Appearance in both cases.

I believe that these cases can be removed to federal court based on diversity of citizenship and federal question jurisdiction. To avoid unnecessary motion practice as to diversity of citizenship jurisdiction, I request that you provide me with the names, addresses, and citizenship of the members of Margar Associates Limited Partnership and its constituent members. Since I intend to promptly file for removal in both cases, I would appreciate if you would furnish me with the information requested not later than 10 a.m. on Monday June 9, 2025.

Thank you in advance for your cooperation.

Very truly yours,


JAY EDMOND RUSS

Ira Levine

From: Simcha Schonfeld <sds@kandsllp.com>
Sent: Sunday, June 8, 2025 11:03 PM
To: Ira Levine
Cc: Jay Russ; Dan Rosenthal; Jason Kramer
Subject: RE: Index No. 516603/2025 & Index No. 516608/2025 - Margar Assoc, LP v. Levitt et al

Ira - We have looked into your request and have determined that there is no basis for removing these cases to federal court. No further information will be provided until all defendants are served or service waived.

In addition, please provide Michael J. Levitt's current home address as we only have his business address and his current address is necessary for service as well as germane to the matter of jurisdiction.



Simcha D. Schonfeld, Esq.
Partner

P (212) 796-8916 F (212)-401-4757
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Please note that any and all contracts and transaction-related documents transmitted in this email remain subject to the review and approval of my client, unless stated otherwise.

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From: Ira Levine <ira.levine@iralevinelaw.com>
Sent: Saturday, June 7, 2025 2:07 PM
To: Simcha Schonfeld <sds@kandsllp.com>
Cc: Jay Russ <jayruss@russrusspc.com>; Dan Rosenthal <danrosenthal@russrusspc.com>; Jason Kramer <jkramer@kandsllp.com>
Subject: RE: Index No. 516603/2025 & Index No. 516608/2025 - Margar Assoc, LP v. Levitt et al

Mr. Schonfeld: The firm has appeared for all defendants but has not accepted service of process on behalf of the defendants and is not authorized to accept process on their behalf. Our firm's appearance does not constitute a waiver of defects in service of process.
Please respond to Mr. Russ's letter.

Cordially,

Ira Levine, Esq.
543 Broadway
Massapequa, New York 11758
Office: 516-541-1072

Cell: 516-509-2935

Email: ira.levine@iralevinelaw.com

From: Simcha Schonfeld <sds@kandsllp.com>

Sent: Friday, June 6, 2025 1:44 PM

To: Ira Levine <ira.levine@iralevinelaw.com>

Cc: Jay Russ <jayruss@russrusspc.com>; Dan Rosenthal <danrosenthal@russrusspc.com>; Jason Kramer <jkramer@kandsllp.com>

Subject: RE: Index No. 516603/2025 & Index No. 516608/2025 - Margar Assoc, LP v. Levitt et al

You did appear. I am asking that you acknowledge service of the complaint on behalf of all defendants.



Simcha D. Schonfeld, Esq.

Partner

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From: Ira Levine <ira.levine@iralevinelaw.com>

Sent: Friday, June 6, 2025 1:42 PM

To: Simcha Schonfeld <sds@kandsllp.com>

Cc: Jay Russ <jayruss@russrusspc.com>; Dan Rosenthal <danrosenthal@russrusspc.com>; Jason Kramer <jkramer@kandsllp.com>

Subject: RE: Index No. 516603/2025 & Index No. 516608/2025 - Margar Assoc, LP v. Levitt et al

Unless I am mistaken, R&R appeared for all defendants.

Ira Levine, Esq.

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Email: ira.levine@iralevinelaw.com

From: Simcha Schonfeld <sds@kandsllp.com>

Sent: Friday, June 6, 2025 1:22 PM

To: Ira Levine <ira.levine@iralevinelaw.com>

Cc: Jay Russ <jayruss@russrusspc.com>; Dan Rosenthal <danrosenthal@russrusspc.com>; Jason Kramer <jkramer@kandsllp.com>

Subject: RE: Index No. 516603/2025 & Index No. 516608/2025 - Margar Assoc, LP v. Levitt et al

Ira – I am happy to respond in detail to your letter, but before I do so, I ask that you acknowledge or waive service on behalf of all defendants.



Simcha D. Schonfeld, Esq.

Partner

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From: Ira Levine <ira.levine@iralevinelaw.com>

Sent: Thursday, June 5, 2025 5:37 PM

To: Simcha Schonfeld <sds@kandsllp.com>

Cc: Jay Russ <jayruss@russrusspc.com>; Dan Rosenthal <danrosenthal@russrusspc.com>

Subject: Index No. 516603/2025 & Index No. 516608/2025 - Margar Assoc, LP v. Levitt et al

Mr. Schonfeld:

I am counsel to Russ & Russ P.C., attorneys for Defendants in these two cases. Please see the attached letter from Mr. Russ.

Cordially,

Ira Levine, Esq.

543 Broadway

Massapequa, New York 11758

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Cell: 516-509-2935

Email: ira.levine@iralevinelaw.com